

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MARY ANNE CHAPLEAU,)	
)	
Plaintiff,)	
v.)	No. 11 C 5636
)	
MICHAEL J. ASTRUE, Commissioner of)	Magistrate Judge Gilbert
Social Security,)	
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF JUDGMENT WITH REMAND

Plaintiff and Defendant jointly move this court for entry of judgment with remand. This court has the power, pursuant to sentence four of Section 205(g) of the Social Security Act, “to enter, upon the pleadings and transcript of the record, a judgment affirming, modifying, or reversing the decision of the [Commissioner], with or without remanding the cause for a rehearing.” 42 U.S.C. § 405(g); *Shalala v. Schaefer*, 509 U.S. 292 (1993); *Melkonyan v. Sullivan*, 501 U.S. 89 (1991).

The Parties agree that, on remand, Plaintiff will be provided with the opportunity for a *de novo* hearing and to submit additional evidence and arguments. The administrative law judge will obtain supplemental information from a vocational expert concerning the effect of any assessed functional limitations on Plaintiff’s occupational base; determine whether Plaintiff has the ability to make a successful adjustment to other work that exists in significant numbers in the economy; and issue a new decision.

WHEREFORE, the parties respectfully request that this court enter judgment reversing the Commissioner's decision pursuant to sentence four of U.S.C. § 405(g) and remand the case to the Commissioner for further administrative action consistent with this joint motion.

Respectfully submitted,

Attorney for Plaintiff:

GARY S. SHAPIRO
Acting United States Attorney

By: s/ Barry A. Schultz¹

BARRY A. SCHULTZ
Law Offices of Barry A. Schultz, P.C.
1601 Sherman Avenue, Suite 510
Evanston, Illinois 60201
(847) 864-0224
maisha@barryschultz.com

By: s/ LaShonda A. Hunt

LASHONDA A. HUNT
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 886-4190
lashonda.hunt@usdoj.gov

Of Counsel:

GRACE M. KIM
Acting Regional Chief Counsel
Social Security Administration

JARED C. JODREY
Assistant Regional Counsel
200 West Adams Street, Suite 3000
Chicago, Illinois 60606
(877) 800-7578 ext. 19134

¹ Signed by LaShonda Hunt for Barry Schultz, with consent obtained by Jared Jodrey, Assistant Regional Counsel, on October 9, 2012.